

**VIA ECF**

June 17, 2025

Hon. Sidney H. Stein  
U.S. District Court  
Southern District of New York  
500 Pearl St., Room 24A  
New York, NY 10007-1312

RE: *In re OpenAI Copyright Litigation*, 25-md-3143 (SHS) (OTW)

Dear Judge Stein:

Pursuant to this Court's May 22, 2025 Case Management Order, the parties in the above-referenced case submit the attached Joint [Proposed] Case Schedule. The parties have agreed on all the proposed dates except for three dates marked in **bold red text** in the attached document.

June 17, 2025

Respectfully submitted,

*/s/ Steven Lieberman*  
Steven Lieberman  
Rothwell Figg Ernst & Manbeck, P.C.  
*On behalf of News Plaintiffs*

*/s/ Justin Nelson*  
Justin Nelson  
Susman Godfrey L.L.P.  
*On behalf of Class Plaintiffs*

*/s/ Paven Malhotra*  
Paven Malhotra  
Keker, Van Nest & Peters LLP  
*On behalf of OpenAI*

*/s/ Jared Briant*  
Jared Briant  
Faegre, Drinker, Biddle & Reath LLP  
*On behalf of Microsoft*

cc: All Counsel of Record (via ECF)